EXHIBIT 2

George F. Gardner is the controlling stockholder of Raystay Company which is the licensee of low power television station W40AF at Dillsburg, PA. Raystay is also the permittee of the following low power television stations:

Call Letters	Location
W38BE	Lebanon, PA
W55BP	Lebanon, PA
W56CJ	Red Lion, PA
W31AX	Lancaster, PA
W23AW	Lancaster, PA

Mary Anne Adams is the trustee for her two sons, Patrick Joseph Molle and Gregory George Molle. Each son owns 8.5% of the Class B non-voting stock of Raystay.

Raystay Company was the owner and operator of standard broadcast station WEEO in Waynesboro, PA from January 1971 to February 1980 and from August 1983 to October 1984. Raystay Company operated standard broadcast station WTTO in Toledo, OH from November 1973

was an applicant for a construction permit for a new commercial television station seeking the facilities of KHJ-TV, Los Angeles, California. In RKO General, Inc., 3 FCC Rcd 5057, 65 RR 2d 192 (1988), the Commission dismissed LPTV's application as unacceptable for filing. A second application for the same facilities (File No. BPCT-881028KG was dismissed by the Commission in RKO General, Inc. (KHJ-TV), 4 FCC Rcd 1304, 65 RR 2d 1548 (1989). LATV appealed the Commission's actions to the U.S. Court of Appeals. LATV then dismissed its appeal pursuant to an Agreement to Dismiss Appeal dated August 3, 1989.

George F. Gardner was the sole stockholder of Adwave Company, an applicant for a construction permit for a new FM broadcast station on Channel 290 at Fort Lauderdale, FL (File No. BPH-830510AL). In RKO General, Inc., 4 FCC Rcd 4679, 66 RR 2d 1162 (Rev. Bd. 1989), the Review Board, with Board Member Blumenthal dissenting, disqualified Adwave because it resolved a misrepresentation/ lack of candor issue involving a divestiture commitment by George F. Gardner, Adwave's sole stockholder, adversely to Adwave. In RKO General, Inc. (WAXY-FM), 5 FCC Rcd 642, 67 RR 2d 508 (1990), the Commission approved a settlement agreement dismissing Adwave's application.

The Commission ruled that George Gardner could submit a specific showing of good character in support of future applications he might file with the Commission. Such a showing was made and accepted with respect to the low power television stations of which Raystay is now a permittee. See letter dated July 23, 1990 to George F. Gardner signed by Roy J. Stewart, Chief of the Mass Media Bureau (in re BPTTL-890309NX, Red Lion, PA, et al.). The applicant reaffirms the affirmative showing of rehabilitation and good character accepted by the Mass Media Bureau in 1990. Furthermore, since the filing of the Adwave application in 1983, no allegations have been made of any significant misconduct of any kind by George F. Gardner, or any company with which he has been involved. Furthermore, he is aware of no such misconduct.

EXHIBIT 3

George F. Gardner, a stockholder, officer and director of the applicant is the father of Mary Anne Adams, an officer, director and stockholder of the applicant.

David A. Gardner and Jon C. Gardner are sons of George F. Gardner and brothers of Mary Anne Adams. They are general partners in Pacific View Broadcasting, an applicant for a new FM station at Hilo, Hawaii (BPH-910206MF). There is pending before the Commission a joint request for approval of settlement, which if granted will result in the grant of the Pacific View application.

EXHIBIT 4

December 20, 1991

Ms. Mary Anne Adams
Vice President
Glendale Broadcasting Company
469 E. North Street
Carlisle, PA 17013

Dear Mary Anne:

This is in connection with Glendale Broadcasting Company's application for a new television station in Miami.

The sum of $2,169,816 will be required to meet the construction and initial operation costs for three months. I am willing to loan to Glendale Broadcasting Company up to that amount for construction and initial operation costs. The loan will be for a five year period at 9% interest. No collateral will be required. No principal or interest need be paid until the station has been broadcasting for six months. I have more than sufficient assets to meet this commitment. While I do not have net liquid assets totaling this amount, I have

Glendale Broadcasting Company to $1,219,839. That total would include the first six lease payments of $206,423 to The Firestone Company, as well as post-grant, pre-operation expenses and costs of operation for 90 days. However, I am prepared to loan the entire $2,169,816 required by Glendale Broadcasting Company, if for any reason Glendale Broadcasting Company does not utilize the lease arrangements with The Firestone Company.

Finally, I intend to loan Glendale Broadcasting Company sufficient funds as it prosecutes its application to meet all of its expenses on an ongoing basis.

Sincerely yours,

George F. Gardner

George F. Gardner

EXHIBIT 5

In order to be responsive to the issues of public concern facing the Glendale Broadcasting Company's service area, it proposes the following illustrative programming: call-in programs, editorials and discussions.

JOHN J. MULLANEY
JOHN H. MULLANEY, P.E.

MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

301 921-0115

ENGINEERING EXHIBIT EE:

GLENDALE BROADCASTING COMPANY
MIAMI, FLORIDA
Channel 45+ 3012 KW-DA 310 Meters

DECEMBER 23, 1991

ENGINEERING IN SUPPORT OF
AN APPLICATION FOR A
NEW UHF TELEVISION STATION

MX WITH RENEWAL OF WHFT CH. 45

ORIGINAL
SIGNATURE

Section V-C - TV BROADCAST ENGINEERING DATA	FOR COMMISSION USE ONLY File No. _____ ASB Referral Date _____ Referred by _____

Name of Applicant

Call letters *(if issued)*

Glendale Broadcasting Company ---

Purpose of Application *(check appropriate box)*: **MX with Renewal of WHFT**

- ■ Construct a new (main) facility
- ☐ Construct a new auxiliary facility
- ☐ Modify existing construction permit for main facility
- ☐ Modify existing construction permit for auxiliary facility
- ☐ Modify licensed main facility
- ☐ Modify licensed auxiliary facility

If purpose is to modify, indicate nature of change(s) by checking appropriate box(es), and specify the file number(s) of the authorization(s) affected:

- ☐ Antenna supporting-structure height
- ☐ Effective radiated power
- ☐ Antenna height above average terrain
- ☐ Frequency
- ☐ Antenna location
- ☐ Antenna system
- ☐ Main Studio location
- ☐ Other *(Summarize briefly)*

File Number(s) _____

1. Allocation:

Channel No. 45

Offset *(check one)*
- ■ Plus
- ☐ Minus
- ☐ Zero

Principal community to be served:		
City	County	State
Miami	Dade	FL

Zone *(check one)*
- ☐ I
- ☐ II
- ■ III

Glendale Broadcasting Company

4. Does the application propose to correct previous site coordinates? ☐ Yes ■ No
If Yes, list old coordinates.

Latitude ° ' "	Longitude ° ' "

5. Has the FAA been notified of the proposed construction? ☐ Yes ■ No
If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available. Existing Tower. No Change in Height

Exhibit No. ---

Date -- Office where filed --

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

	Landing Area	Distance (km)	Bearing (degrees True)
(a)	North Perry	6.7	278
(b)			

7. (a) Elevation: *(to the nearest meter)*

(1) of site above mean sea level; 7' 2 meters

(2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 1042' 318 meters

(3) of the top of supporting structure above mean sea level [(a)(1) + (a)(2)]. 1049' 320 meters

(b) Height of antenna radiation center: *(to the nearest meter)*

(1) above ground; 1016' 310 meters

(2) above mean sea level [(a)(1) + (b)(1)]; and 1023' 312 meters

(3) above average terrain. 1017' 310 meters

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(b)(3). If mounted on an AM directional-array element, specify heights and orientations of all array towers, as well as location of TV radiator.

Exhibit No. EE

Figure 3

9. Maximum visual effective radiated power 3012 kW

10. Antenna:

(a) Manufacturer Harris (b) Model No. TWSC-25

(c) Is a directional antenna proposed? ■ Yes ☐ No

If Yes, specify major lobe azimuth(s) 190 & 350 degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. Figures 4-A, 4-B, 4-C — Exhibit No. EE

(d) Is electrical beam tilt proposed? ■ Yes ☐ No

If Yes, specify 0.5 degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. Figure 4 — Exhibit No. EE

(e) Is mechanical beam tilt proposed? ☐ Yes ■ No

If Yes, specify -- degrees mechanical beam tilt toward azimuth -- degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. — Exhibit No. --

(f) The proposed antenna is: *(check only one box)*

■ horizontally polarized ☐ circularly polarized ☐ elliptically polarized

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.685(a) and (b)? ■ Yes ☐ No

If No, attach as an Exhibit Justification therefor, including amounts and percentages of population and area that will not receive City Grade service. — Exhibit No. --

12. Will the main studio be located within the station's predicted principal community contour as defined by 47 C.F.R. Section 73.685(a)? ■ Yes ☐ No

If No, attach as an Exhibit Justification pursuant to 47 C.F.R. Section 73.1125. — Exhibit No. --

13. Does the proposed facility satisfy the requirement of 47 C.F.R. Section 73.610? ■ Yes ☐ No

If No, attach as an Exhibit Justification therefor, including a summary of any previously granted waiver(s). — Exhibit No. --

14. Are there: (a) within 80 meters of the proposed antenna, any proposed or authorized FM or TV transmitters; or (b) in the general vicinity, any nonbroadcast *(except citizens band or amateur)* radio stations or any established commercial or government receiving stations? ■ Yes ☐ No

If Yes, attach as an Exhibit a description of the expected, undesired effects of operations and remedial steps to be pursued, if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference *(including that caused by intermodulation)* to facilities in existence or authorized prior to grant of this application. *(See 47 C.F.R. Sections 73.685(d) and (g).)* — Exhibit No. EE

15. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.684(g). The map must further display clearly and legibly the original — Exhibit No. --

16. Attach as an Exhibit a map *(Sectional Aeronautical Chart or equivalent)* which shows clearly, legibly and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. EE

Figures 2 and 2-A

(a) The proposed transmitter location, and the radials along which profile graphs have been prepared;
(b) The City Grade, Grade A and Grade B predicted contours; and
(c) The legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km.) and population *(latest census)* within the predicted Grade B contour.

Area 8,314 sq. km. Population 2,998,538

18. For an application involving an auxiliary facility only, attach as an Exhibit a map *(Sectional Aeronautical Chart or equivalent)* that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. --

DNA

(a) The proposed auxiliary Grade B contour; and
(b) The Grade B contour of the licensed main facility for which the applied-for facility will be the auxiliary.

(Main facility license file number _____)

19. Terrain and Coverage Data *(To be calculated in accordance with 47 C.F.R. Section 73.684.)*

Source of terrain data: *(check only one box below)*

☐ Linearly interpolated 60-second database (Source: _____)

■ 7.5 minute topographic map Taken From File of WHFT

☐ Other *(briefly summarize)*

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances		
		To the City Grade Contour (kilometers)	To the Grade A Contour (kilometers)	To the Grade B Contour (kilometers)
CITY* 200	310.0	52.6	61.6	78.9
0	310.3	52.5	61.5	78.9
45	310.0	41.8	50.7	66.0
90	310.3	39.3	48.1	63.1
135	310.0	38.9	47.6	62.8
180	310.0	52.0	61.2	78.2
225	309.7	49.1	58.1	74.3
270	310.6	35.1	43.8	58.7
315	310.0	47.8	56.6	72.6

*Radial through principal community, if not one of the major radials. This radial should NOT be included in calculation of HAAT.

20. Environmental Statement *(See 47 C.F.R. Section 1.1301 et seq.)*

Would a Commission grant of this application come within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact? ☐ Yes ■ No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311. Exhibit No. --

If No, explain briefly why not. See Exhibit EE

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name *(Typed or Printed)*	Relationship to Applicant *(e.g., Consulting Engineer)*
John J. Mullaney	Consulting Engineer
Signature: John J. Mullaney	Address *(Include ZIP Code)* Mullaney Engineering, Inc. 9049 Shady Grove Court Gaithersburg, MD 20877
Date: 12/23/91	Telephone No. *(Include Area Code)* (301) 921-0115

ENGINEERING EXHIBIT EE:

GLENDALE BROADCASTING COMPANY
MIAMI, FLORIDA
Channel 45+ 3012 KW-DA 310 Meters

TABLE OF CONTENTS:

- Existing Tower, Topo Map Not Required.

MULLANEY ENGINEERING, INC.

DECLARATION

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by Glendale Broadcasting Company to prepare an application for a new TV station that is Mutually Exclusive with the renewal of WHFT at Miami, FL.

All facts contained herein are true of his own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

John J. Mullaney

Executed on the 23rd day of December 1991.

ENGINEERING EXHIBIT EE:

GLENDALE BROADCASTING COMPANY
MIAMI, FLORIDA
Channel 45+ 3012 KW-DA 310 Meters

NARRATIVE STATEMENT:

I. **GENERAL:**

This engineering statement has been prepared on behalf of Glendale Broadcasting Company. The purpose of this statement is to request a Construction Permit (CP) for a NEW UHF Television Station on Channel 45+ at Miami, Florida. It should be understood that this application is Mutually Exclusive with the renewal of WHFT for Ch. 45 at Miami, FL. Glendale is proposing to locate on the same tower and at essentially the same height and with a slightly larger ERP from a similar antenna pattern as now used by WHFT. Glendale proposes to operate with an E.R.P. of 3012 KW-DA and an HAAT of 310 Meters (1017 Feet)

The application is not a major environmental action, as defined by Section 1.1307 of the Commission's Rules. The proposed facility is in full compliance with the FCC / ANSI Radiation Guidelines.

Answers to questions contained in F.C.C. Form 301, Section V-C are incorporated in the following paragraphs and figures.

II. ENGINEERING DISCUSSION:

A. Proposed Location:

Glendale proposes to locate on the existing tower upon which WHFT currently operates. The tower is located at the SW corner of S. 33rd Avenue & Pembroke Road, Pembroke Park, FL. The City of License, Miami, Florida, is located approximately 26 kilometers on a bearing of N-200-E from this site. Since an existing tower will be used with no change in overall height a Topographic Map showing the proposed site has not been submitted.

The geographic coordinates are:

Latitude: 25° 59′ 34"
Longitude: 80° 10′ 27"

The regional office of the F.A.A. was not notified of the proposed construction since an existing tower will be used with no change in overall height.

B. Transmitter:

Glendale proposes to install a type accepted TV transmitter. The transmitter will be operated at 60 KW Visual and 6 KW Aural, which is within its rated power.

A calibrated dummy-load and wattmeter will be used in accordance with the transmitter manufacturer's instructions for determining and maintaining power output.

C. **Antenna:**

Glendale proposes to install a Harris Wavestar UHF TV Antenna with a directional horizontal pattern ("bent peanut"). The antenna will have major lobes pointing at 190 & 350 degrees true (Gain= 2.5).

Figure 4, is a plot of the proposed elevation radiation pattern which incorporates 0.5^{o} of beam tilt and some null fill-in.

Figure 4-A is a plot of the proposed directional horizontal radiation pattern (relative field).

Figure 4-B is a plot of the proposed directional horizontal radiation pattern (dBK).

Figure 4-C is a tabulation of the proposed directional horizontal radiation pattern (relative/dBK/KW).

The antenna has a maximum vertical plane power gain of 13.98 dB (25 times) in the main lobe and 13.1 dB (20.42 times) at the horizontal. When the directional horizontal pattern is combined with the vertical plane pattern the antenna will produce 62.5 times the antenna input power in the main lobe.

D. **Tower & Transmission Line:**

Glendale proposes to pole mount the proposed antenna on top of an existing tower. Figure 3 is a vertical sketch of the proposed tower and antenna. The total structure will have an overall height of 317.6 meters (1042 feet) AGL.

The antenna will be fed by 1020 feet of 8-3/16" Rigid Line. The proposed line will have a loss of 0.95 dB and, therefore, will have an efficiency of 80.3 percent.

E. Auxiliary Power:

Glendale proposes to install an Auxiliary Power Generators to supply electrical power to their proposed studio and transmitter sites.

F. Effective Radiated Power:

Giving consideration for the maximum antenna gain, transmitter power and line loss, the following is the maximum effective radiated power:

	E. R. P. KW	E. R. P. dBK
Visual-Max:	3012	34.79
Aural-Max:	301	24.79

At the Horizontal, the ERP will be 2460 KW-DA (Visual).

G. Terrain Profile Data and Coverage:

Terrain profile data was taken from the license file of WHFT. The HAAT is based upon the standard eight radials.

Using the terrain data, the predicted City Grade (80 dBu), Grade A (74 dBu), and Grade B (64 dBu) contours were determined by a computerized mathematical model of the data shown in Figure 10.b of Section 73.699 of the Commission's Rules, the F(50,50) curves. This is the Commission's computer program TV-FMFS, (Report RS-76-01, dated January, 1976).

The N-200-E radial is the direct path to the city of license, Miami, Florida. After comparing the terrain along this path against the proposed antenna height it was determined that the proposed City Grade contour will

completely encompass the principal city without major terrain obstructions.

The Grade A, B, and City Grade contours are plotted in Figure 2. From this figure it can be seen that the required City Grade coverage is provided. Figure 2-A is a tabulation of the distances to these contours.

H. Channel Allocation:

Figure 5 is a tabulation of the channel allocation conditions using the proposed site as a reference point. From the tabulation it can be seen that this proposal EXCEEDS the minimum required spacing to all existing or proposed stations.

The application is also MUTUALLY EXCLUSIVE with the renewal of WHFT on Ch. 45 at Miami, FL.

I. Coverage Area and Population:

The land area contained within the Grade B contour is 8,314 square kilometers and has been computed mathematically (water area removed).

The population within the Grade B contour is 2,998,538 persons and was obtained through a computerized analysis of the census designated places population data contained in the 1980 Census.

J. Other Services in Area:

There are NO known AM Broadcast Stations within 3.2 kilometers of the proposed site.

The proposed site is an existing tower used by numerous other facilities. Figure 6 is a listing of all known or proposed broadcast facilities. In addition, the tower

has several two-way & microwave facilities located on it.

There are other known FM or TV transmitters within 10 kilometers (6.2 miles) of the proposed site, however, based on the type of transmitter proposed, and the frequency & power involved no intermodulation interference problems with existing transmitting facilities is expected. In the unlikely event some problems would occur, the applicant will investigate and correct such cases in accordance with the Commission's Rules. It should be understood that since this is the existing site of WHFT few new problems are anticipated.

K. Environmental Assessment Statement:

Glendale believes its proposal will not significantly affect the environment since it does not meet any of the criteria specified in Section 1.1307 of the rules. When consideration is given to the fact that an existing tower will be used with no change in overall height the only remaining issue is that of R.F. exposure. Specifically the proposed facility:

1. Will NOT involve the exposure of workers or the general public to levels of radiofrequency radiation in excess of the "Radio Frequency Protection Guide" recommended by ANSI (C95-1-1982).

   The following is a more detailed discussion of this protection standard:

   a. National Environmental Policy Act of 1969:

   In 1969, Congress enacted the National Environmental Policy Act (NEPA), which requires the FCC to evaluate the potential environmental significance of the facilities it regulates and

authorizes. Human exposure to Radio Frequency (RF) radiation has been identified as an issue the FCC must consider.

Beginning with the filing of applications after January 1, 1986, broadcast stations will be

VERP = peak Visual ERP in watts (above a dipole)
VERP = Aural ERP in watts (above a dipole)
PD = highest Power Density in milli-watts/cm^2
SQRT = Square Root
Freq = Frequency in mega-cycles/sec. (mHz)

The vertical radiation pattern of the TV antenna specified in this application is very narrow and therefore the power density as seen by an observer on the ground near the base of the tower will be less than 10 percent of the total ERP or 301 KW.

The application of the above equation (assuming maximum ERP), in our case, for a frequency of 656 to 662 MHz and a Power Density of 2.20 milli-watts results in a minimum distance of 151.4 meters (497 feet) from the antenna. Inasmuch as the lowest element on the proposed antenna will be approximately 303 meters (994 feet) above ground level, it is self-evident that no hazard from radiation will exist to persons at ground level from this facility. Until now, the computations have been based upon worst case. Upon review of Figure 4, Elevation Radiation Pattern, it can be determined that a form factor of less than F=0.2 is more typical of this antenna. This reduces the minimum separation from the antenna to 30.3 meters (99 feet). More importantly, the computed contribution from this facility at ground level is 0.0097 of the ANSI standard. **Consequently, this facility is categorically excluded from consideration under the joint site policy of the FCC since its contribution is less than 1 percent.** However, prior to beginning its operation, Glendale plans to completely review

the site access plan to determine what, if any, changes need to be made as a result of its modified operation. If need be this will include a complete set of RF measurements.

Workers employed to climb the tower or work in a potential over-exposure location will not be permitted to enter the work area until cleared by the station manager or other responsible person. Appropriate warning signs will be posted to insure safety. In addition, the applicant will establish and enforce work rules and safety procedures applicable in a potential over-exposure area. The rules will establish how close a worker can get to the antenna when it is operating at normal power and specify the power reduction required in order to make other locations safe. It is recognized that maintenance or installation work on or near the antenna will require the station to completely shutdown or switch temporarily to an auxiliary antenna or an auxiliary transmitter site. All employees, contract and other persons having access to areas of potential exposure will be required to sign a site management guide indicating they are aware of and will comply with all safety rules. In the instance of a multiple use site, a single site access policy incorporating the above philosophy will be established. All procedures will be reviewed & updated as necessary on a yearly basis or earlier if circumstances warrant.

III. SUMMARY:

Glendale Broadcasting Company requests a Construction Permit for a NEW UHF Television Station on Channel 45+ at Miami, Florida. The proposed operation will provide the required City Grade signal to the entire City of License. This application is in full compliance with the Commission's Rules. It should be understood that this application is Mutually Exclusive with the renewal of WHFT for Ch. 45 at Miami, FL.

December 23, 1991.

John J. Mullaney